

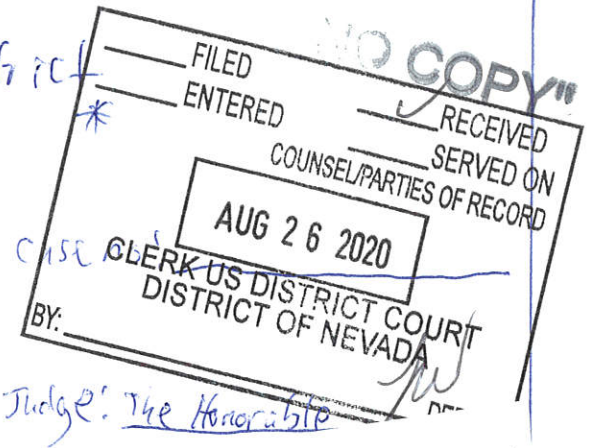
State of Nevada  
 District of Nevada  
 Unofficial Northern District  
 \* \* \* \*

Bobby Lee Fair Jr., D.P.T., M.D., LMT  
 plaintiff

versus

Lakes Crossing Center  
Doctor Culpepper

defendants



Judge: The Honorable

3:20-cv-00491

### Civil Rights Complaint Pursuant To U.S.C 42 5/1983

Comes Now, The Indefatigable Doctor Bobby Lee Fair Jr, in order to pray to the Courts for relief in that he is presently being held against his will at Lakes Crossing Center on grounds that are not lawful and daily being insulted on a personal level.

Doctor Fair was arrested on May 21, 2020 for a Gross Lack of Insight, a charge that has a maximum penalty of ten (10) days in jail, but law was perverted in order to make him submit to those that he does not particularly respect. Dr Fair is a law abiding citizen, and is familiar with his rights. He passed a Nelson hearing in Washoe County; Fareffa Inquiry too. Dr Fair was denied a Probable Cause hearing, a Bond Reduction Hearing, and has heretofore, not been arraigned on any charge. He saw a Judge on July 8 for a so-called competency hearing, but Deputies ended his webinar before he exercised his rights to examine the professional witnesses, ending in Dr. Fair's being sent to Lakes Crossing.

Dr. Fair presented at Lake's Crossing with a positive mood and outlook, willing to work to prove his competency in a short period of time. But Doctor Culpepper, whom Dr. Fair is familiar with from Reno Behavioral,



began a program of personal persecution due to the fact that Dr. Fair and he do not care for each other on a personal level.

Dr. Culpepper began by deleting a good medication regimen that is agreed upon by two very astute local physicians, Dr. Angelene Lawrence and Dr. David Alan Rich. Latencia, Depakote, and Klonopin help Dr. Fair to remain lucid through his battle with Major Depression. Notwithstanding this, Dr. Culpepper has Dr. Fair taking Zyprexa under threat of violence. One instance of this violence has already been carried out against Dr. Fair: techs bursted into his cell to draw his blood when he already agreed to give the draw with no problem.

Dr. Culpepper has flagrantly disobeyed the first premise of the Hippocratic Oath: "First, Do NO Harm" in several manners. The very manual that outlines the treatment program for Lakes Crossing clearly states that all prescription of medication shall be preceded by a psychiatric eval, which I have yet to have, though being here already 17 days in a confinement cell.

The COVID-19 virus was the ostensible reason for my confinement at first, but after 14 days, they now claim that my confinement is to alter my behavior. But the question arises, "What behavior could I demonstrate in a solitary cell that dictates that I should stay in there?" When will I get a chance to demonstrate my personality on the outside? Dr. Culpepper is quoted as saying "You just have to 'behave' for as long as it takes." This highlights his intent to confine me for an indefinite period of time, and heretofore, no treatment has commenced. Please give me relief.

Signed pro se: 75 Kyle Jeff.  
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